

REVISED APPENDIX P: COMPLIANCE INDEX/CROSS REFERENCE LIST

Appendix P provides a cross reference of filing requirements contained in Minnesota Statutes and Rules applicable to the filing and content of resource plans and the plan sections and/or appendices that contain information to fulfill a requirement.¹ In addition, this section identifies those items the Minnesota Public Utilities Commission included in its orders that have required additional information to be included in its future resource plan filings. The table below contains a listing of each order point and its requirement and references the appropriate sections and/or appendices within this filing to locate the information.

Statute or Rule	Requirement	Location
Minn. R. 7843.0300, subp. 3	Completeness of filing. The resource plan filing must contain the information required by part 7843.0400, unless an exemption has been granted under subpart 4.	Refer to contents of resource plan filing points listed below.
Minn. R. 7843.0300, subp. 5	Copies of filings. A covered utility shall submit 15 copies of its resource plan filing to the commission. The commission may request up to ten additional copies of combined and common filings. A utility shall also provide copies to the Minnesota Department of Commerce, the Residential and Small Business Utilities Division of the Office of the Attorney General, the Minnesota Environmental Quality Board and member agencies, and other interested persons or parties who request copies. A utility shall maintain a distribution list. The list must include the names and addresses of the persons or organizations receiving copies and the number of copies provided. A utility is not required to distribute more than 100 copies. However, a utility shall honor reasonable requests for copies of the nontechnical summary identified in part 7843.0400, subpart 4.	See Service List. This requirement is also met via e-Filing and by providing copies to listed parties as requested.
Minn. R. 7843.0400, subp. 1	Advance forecasts. A utility shall include in the filing identified in subpart 2 its most recent annual submission to the Minnesota Department of Commerce and the Minnesota Environmental Quality Board under Minnesota Statutes, sections 216B.2422, subdivision 2a, and 216C.17, and parts 7610.0100 to 7610.0600.	Appendix A: Minnesota Power's 2024 Annual Electric Utility Forecast Report.

¹ With this filing on March 31, 2025, the Company is providing the remaining appendices D, E, F, I, K, M, N, and O in support of its 2025-2039 Integrated Resource Plan ("2025 IRP") filed on March 3, 2025. Minnesota Power has updated and revise this Appendix P to include references to those supplemental materials.

Statute or Rule	Requirement	Location
Minn. R. 7843.0400, subp. 2	Resource plan. A utility shall file a proposed plan for meeting the service needs of its customers over the forecast period. The plan must show the resource options the utility believes it might use to meet those needs. The plan must also specify how the implementation and use of those resource options would vary with changes in supply and demand circumstances. The utility is only required to identify a resource option generically, unless a commitment to a specific resource exists at the time of the filing. The utility shall also discuss plans to reduce existing resources through sales, leases, deratings, or retirements.	Section II, Section V, and Appendix D: Future Resource Options.
Minn. R. 7843.0400, subp. 3(A)	Supporting information. A utility shall include in its resource plan filing information supporting selection of the proposed resource plan. When a utility's existing resources are inadequate to meet the projected level of service needs, the supporting information must contain a complete list of resource options considered for addition to the existing resources. At a minimum, the list must include new generating facilities of various types and sizes and with various fuel types, cogeneration, new transmission facilities of various types and sizes, upgrading of existing generation and transmission equipment, life extensions of existing generation and transmission equipment, load-control equipment, utility-sponsored conservation programs, purchases from nonutilities, and purchases from other utilities. The utility may seek additional input from the commission regarding the resource options to be included in the list. For a resource option that could meet a significant part of the need identified by the forecast, the supporting information must include a general evaluation of the option, including its availability, reliability, cost, socioeconomic effects, and environmental effects.	Section V, Appendix B: Demand Side Management, Appendix D: Future Resource Options, Appendix F: Transmission Planning Activities, Appendix J: Assumptions and Outlooks, Appendix K: Detailed Analysis Section, Appendix M: Socioeconomic Impact Analysis, Appendix N: Engagement Report and Societal Cost Benefit Analysis, and Appendix O: Hibbard Retirement Study.
Minn. R. 7843.0400, subp. 3(B)	The supporting information must include descriptions of the overall process and of the analytical techniques used by the utility to create its proposed resource plan from the available options.	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis.
Minn. R. 7843.0400, subp. 3(C)	The supporting information must include an action plan, a description of the activities the utility intends to undertake to develop or obtain noncurrent resources identified in its proposed plan. The action plan must cover a five-	Section II and Section VI.

Statute or Rule	Requirement	Location
	year period beginning with the filing date. The action plan must include a schedule of key activities, including construction and regulatory filings.	
Minn. R. 7843.0400, subp. 3(D)	For the proposed resource plan as a whole, the supporting information must include a narrative and quantitative discussion of why the plan would be in the public interest, considering the factors listed in part 7843.0500, subpart 3.	Section V, Appendix K: Detailed Analysis, Appendix L: Cost Impact Analysis by Customer Class, Appendix M: Socioeconomic Impact Analysis, Appendix N: Engagement Report and Societal Cost Benefit Analysis, and Appendix O: Hibbard Retirement Study.
Minn. R. 7843.0400, subp. 4	Nontechnical summary. A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length and describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.	Section II.
Minn. Stat. § 216B.1691, subd. 2a	Eligible energy technology standard. Each electric utility shall generate or procure sufficient electricity generated by an eligible energy technology to provide its retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides wholesale electric service, so that the electric utility generates or procures an amount of electricity from an eligible energy technology that is equivalent to at least the following standard percentages of the electric utility's total retail electric sales to retail customers in Minnesota are generated by eligible energy technologies by the end of the year indicated: (1) 2012 12 percent (2) 2016 17 percent (3) 2020 20 percent (4) 2025 25 percent (5) 2035 55 percent	Appendix E: Environmental Policy and Compliance Assessment, Appendix H: Minnesota Power's Renewable Energy, and Appendix I: Carbon-Free Standard Compliance.

Statute or Rule	Requirement	Location
Minn. Stat. § 216B.1691, subd. 2e	Rate impact of standard compliance; report. Each electric utility must submit to the commission and the legislative committees with primary jurisdiction over energy policy a report containing an estimation of the rate impact of activities of the electric utility necessary to comply with this section. In consultation with the Department of Commerce, the commission shall determine a uniform reporting system to ensure that individual utility reports are consistent and comparable, and shall, by order, require each electric utility subject to this section to use that reporting system. The rate impact estimate must be for wholesale rates and, if the electric utility makes retail sales, the estimate shall also be for the impact on the electric utility's retail rates. Those activities include, without limitation, energy purchases, generation facility acquisition and construction, and transmission improvements. A report must be updated and submitted as part of each integrated resource plan or plan modification filed by the electric utility under section 216B.2422. The reporting obligation of an electric utility under this subdivision expires December 31, 2040.	Section II, Section V, Appendix H: Minnesota Power's Renewable Energy, Appendix L: Cost Impact by Customer Class.
Minn. Stat. § 216B.1691, subd. 2g	Carbon-free standard. In addition to the requirements under subdivisions 2a and 2f, each electric utility must generate or procure sufficient electricity generated from a carbon-free energy technology to provide the electric utility's retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides wholesale electric service, so that the electric utility generates or procures an amount of electricity from carbon-free energy technologies that is equivalent to at least the following standard percentages of the electric utility's total retail electric sales to retail customers in Minnesota by the end of the year indicated: (1) 2030 - 80 percent for public utilities; 60 percent for other electric utilities (2) 2035 - 90 percent for all electric utilities (3) 2040 - 100 percent for all electric utilities	Section V, Appendix E: Environmental Policy and Compliance Assessment, Appendix H: Minnesota Power's Renewable Energy, Appendix I: Carbon-Free Standard Compliance, and Appendix K: Detailed Analysis Section.
Minn. Stat. § 216B.1691, subd. 3(a)	Utility plans filed with commission. (a) Each electric utility shall report on its plans, activities, and progress with regard to the standard obligations under this section in its filings under section 216B.2422 or in a separate report submitted to the commission every two years, whichever is more frequent, demonstrating to the commission the utility's effort to comply with this section. In its resource plan or a separate report, each electric utility shall provide a	This information is reported in Minnesota Power's biennial Compliance Report. <i>See In the Matter of Commission Consideration and Determination of Compliance with Renewable</i>

Statute or Rule	Requirement	Location
	<p>description of:</p> <ul style="list-style-type: none"> (1) the status of the utility's renewable energy mix relative to the standard obligations; (2) efforts taken to meet the standard obligations; (3) any obstacles encountered or anticipated in meeting the standard obligations; (4) potential solutions to the obstacles; (5) the number of Minnesotans employed to construct facilities designed to meet the utility's standard obligations under this section; (6) efforts taken to retain and retrain workers employed at electric generating facilities that the utility has ceased operating or designated to cease operating for new positions constructing or operating facilities used to meet a utility's standard obligation; (7) the impacts of facilities designed to meet the utility's standard obligations under this section on environmental justice areas; (8) efforts made to increase the diversity of both the utility's workforce and vendors; and (9) for an electric utility utilizing renewable energy credits to satisfy any portion of the electric utility's obligations under this section, the following information: <ul style="list-style-type: none"> (i) the name and location of energy facilities that generated the energy associated with the credits; (ii) the dates when the energy associated with the credits was generated; (iii) the type of fuel that generated the energy associated with the credits; and (iv) whether the energy associated with the credits was purchased by the utility purchasing the credits. 	<p><i>Energy Standards (RES) Biennial Reporting</i>, Docket No. E-999/M-22-85, Minnesota Power Report (June 3, 2024). <i>See also</i> Appendix H: Minnesota Power's Renewable Energy.</p>
Minn. Stat. § 216B.2422, subd. 2(c)	As a part of its resource plan filing, a utility shall include the least cost plan for meeting 50 and 75 percent of all energy needs from both new and refurbished generating facilities through a combination of conservation and renewable energy resources.	Section V.

Statute or Rule	Requirement	Location
Minn. Stat. § 216B.2422, subd. 2a	Historical data and advance forecast. Each utility required to file a resource plan under this section shall include in the filing all applicable annual information required by section 216C.17, subdivision 2, and the rules adopted under that section. To the extent that a utility complies with this subdivision, it is not required to file annual advance forecasts with the department under section 216C.17, subdivision 2.	Appendix A: Minnesota Power's 2024 Annual Electric Utility Forecast Report.
Minn. Stat. § 216B.2422, subd. 2c	Long-range emission reduction planning. Each utility required to file a resource plan under subdivision 2 shall include in the filing a narrative identifying and describing the costs, opportunities, and technical barriers to the utility continuing to make progress on its system toward achieving the state greenhouse gas emission reduction goals established in section 216H.02, subdivision 1, and the technologies, alternatives, and steps the utility is considering to address those opportunities and barriers.	Section II, Section V, Section VI, Section VII, and Appendix E: Environmental Policy and Compliance Assessment.
Minn. Stat. § 216B.2422, subd. 2d	Plan to minimize impacts to workers due to facility retirement. A utility required to file a resource plan under subdivision 2 that has scheduled the retirement of an electric generating facility located in Minnesota must include in the filing a narrative describing the utility's efforts, in conjunction with the utility's workers and the workers' designated representatives, to develop a plan to minimize the dislocations employees may suffer as a result of the facility's retirement. The narrative must address, at a minimum, plans to: <ul style="list-style-type: none"> (1) minimize financial losses to workers; (2) provide a transition timeline to ensure certainty for workers; (3) protect pension benefits; (4) extend or replace health insurance, life insurance, and other employment benefits; (5) provide training and skill development for workers who must or choose to leave the utility; (6) create targeted transition plans for workers at all locations impacted by the facility retirement; and (7) quantify any additional costs the utility would incur and specifying what costs, if any, the utility would request be recovered in the utility's rates as a result of efforts made under this subdivision to minimize impacts to workers. 	Section II, Section V, and Appendix I: Carbon-Free Standard Compliance. As described in the 2025-2039 Integrated Resource Plan, Minnesota Power is not proposing the retirement of any electric generating facilities as part of the 2025 Plan.
Minn. Stat. § 216B.2422, subd. 3(a)	Environmental costs. A utility shall use the values established by the commission in conjunction with other external factors, including socioeconomic costs, when evaluating and selecting resource options in all	Section V, Appendix J: Assumptions and Outlooks, and

Statute or Rule	Requirement	Location
	proceedings before the commission, including resource plan and certificate of need proceedings.	Appendix K: Detailed Analysis Section.
Minn. Stat. § 216B.2422, subd. 4	<p>Preference for renewable energy facility. The commission shall not approve a new or refurbished nonrenewable energy facility in an integrated resource plan or a certificate of need, pursuant to section 216B.243, nor shall the commission allow rate recovery pursuant to section 216B.16 for such a nonrenewable energy facility, unless the utility has demonstrated that a renewable energy facility is not in the public interest. When making the public interest determination, the commission must consider:</p> <p>(1) whether the resource plan helps the utility achieve the greenhouse gas reduction goals under section 216H.02, the renewable energy standard under section 216B.1691, or the solar energy standard under section 216B.1691, subdivision 2f;</p> <p>(2) impacts on local and regional grid reliability;</p> <p>(3) utility and ratepayer impacts resulting from the intermittent nature of renewable energy facilities, including but not limited to the costs of purchasing wholesale electricity in the market and the costs of providing ancillary services; and</p> <p>(4) utility and ratepayer impacts resulting from reduced exposure to fuel price volatility, changes in transmission costs, portfolio diversification, and environmental compliance costs.</p>	Section IV, Section V, Appendix K: Detailed Analysis Section, and Appendix O: Hibbard Retirement Study.
Minn. Stat. § 216B.2422, subd. 4a	Preference for local job creation. As part of a resource plan filing, a utility must report on associated local job impacts and the steps the utility and the utility's energy suppliers and contractors are taking to maximize the availability of construction employment opportunities for local workers. The commission must consider local job impacts and give preference to proposals that maximize the creation of construction employment opportunities for local workers, consistent with the public interest, when evaluating any utility proposal that involves the selection or construction of facilities used to generate or deliver energy to serve the utility's customers, including but not limited to an integrated resource plan, a certificate of need, a power purchase agreement, or commission approval of a new or refurbished electric generation facility. The commission must, to the maximum extent possible, prioritize the hiring of workers from communities hosting retiring electric	Section V, Appendix I: Carbon-Free Standard Compliance, Appendix M: Socioeconomic Impact Analysis, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.

Statute or Rule	Requirement	Location
	generation facilities, including workers previously employed at the retiring facilities.	
Minn. Stat. § 216B.2422, subd. 6	Consolidation of resource planning and certificate of need. A utility shall indicate in its resource plan whether it intends to site or construct a large energy facility. If the utility's resource plan includes a proposed large energy facility and construction of that facility is likely to begin before the utility files its next resource plan, the commission shall conduct the resource plan proceeding consistent with the requirements of section 216B.243 with respect to the proposed facility. If the commission approves the proposed facility in the resource plan, a separate certificate of need proceeding is not required.	Not Applicable
Minn. Stat. § 216B.2422, subd. 7	Energy storage systems assessment. (a) Each public utility required to file a resource plan under subdivision 2 must include in the filing an assessment of energy storage systems that analyzes how the deployment of energy storage systems contributes to: (1) meeting identified generation and capacity needs; and (2) evaluating ancillary services. (b) The assessment must employ appropriate modeling methods to enable the analysis required in paragraph (a).	Section V, Appendix D: Future Resource Options, and Appendix K: Detailed Analysis Section.
Minn. Stat. § 216B.2426	Opportunities for distributed generation. The commission shall ensure that opportunities for the installation of distributed generation, as that term is defined in section 216B.169, subdivision 1, paragraph (c), are considered in any proceeding under section 216B.2422, 216B.2425, or 216B.243.	Section V, Appendix B: Demand Side Management, Appendix C: Existing Power Supply, Appendix G: Distribution Planning Activities.

Commission Order	Requirement	Location
<i>In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan</i> , Docket No. E-015/RP-21-33, Order Approving Plan and Setting Additional Requirements (January 9, 2023)		
Order Point 1	The Commission hereby approves Minnesota Power's 2021 Plan with a modification to require Minnesota Power to procure cost-effective resources to meet customer and renewable product needs by 2025 and 2030 by:	See below.p
Order Point 1(a)	Acquiring at least 300 MW and up to 400 MW of wind with at least 200 MW in service by 2026, as practicable.	Section I, Section II, Section V, Appendix C: Existing Power Supply, Appendix H: Minnesota Power's Renewable Energy.
Order Point 1(b)	Acquiring up to 300 MW of regional/in-service territory or net-zero solar and implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026, as practicable.	Section I, Section II, Section V, Appendix H: Minnesota Power's Renewable Energy, and Appendix K: Detailed Analysis Section.
Order Point 1(c)	Working with organized labor and other interested stakeholders to maximize socioeconomic benefits to customers and host communities by prioritizing utility investment in its service territory, use of local labor for construction and permanent staffing, and development of apprenticeship pathways when procuring new energy resources.	Section I, Section V, Appendix H: Minnesota Power's Renewable Energy, Appendix I: Carbon-Free Standard Compliance, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 1(d)	Engaging early in the project development process with city officials for input and collaboration on issues involving projects located in or adjacent to existing host communities; this must include input and collaboration on siting to ensure that projects effectively support the community's own transition plans.	Section II, Appendix H: Minnesota Power's Renewable Energy, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 1(e)	Working collaboratively with large power customers and large light and power customers to pursue at least 50 MW of additional long-term demand response to address future resource adequacy changes.	Section II, Section V, and Appendix B: Demand Side Management.

Commission Order	Requirement	Location
<p><i>In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan</i>, Docket No. E-015/RP-21-33, Order Approving Plan and Setting Additional Requirements (January 9, 2023)</p>		
Order Point 1(f)	Filing, in its next resource plan, a service quality study of its next preferred plan and thoroughly demonstrate how system reliability and resource adequacy will be maintained as it transitions to more intermittent generating resources.	Section V and Appendix K: Detailed Analysis Section.
Order Point 2	Minnesota Power must cease coal operations at Boswell Unit 3 at the latest by December 31, 2029, and Boswell Unit 4 by 2035. Capacity and energy replacement options including transmission solutions for both units will be evaluated during the next resource plan. MISO long range transmission planning and associated processes must be incorporated. These are subject to the following:	Section IV, Section V, Section VI, Section VII, Appendix F: Transmission Planning Activities, and Appendix K: Detailed Analysis Section.
Order Point 2(a)	In its next IRP, Minnesota Power must continue to evaluate additional transmission system reliability mitigations needed to maintain the option of retiring the Boswell facility entirely, including unit 4, by no later than 2030.	Section IV, Section V, and Appendix F: Transmission Planning Activities.
Order Point 2(b)	Through annual updates and in the next IRP, Minnesota Power must also specifically evaluate converting Boswell 3 to a synchronous condenser upon retirement.	Section V and Appendix F: Transmission Planning Activities. <i>See also</i> May 21, 2024, Compliance Filing submitted in Docket No. E015/RP-21-33.
Order Point 2(c)	Through annual updates and in the next IRP, Minnesota Power must describe work done to date and work yet to be completed, provide a schedule of expected milestones, and estimate the earliest date for completion of the transmission system reliability mitigations.	Section V and Appendix F: Transmission Planning Activities. <i>See also</i> May 21, 2024, Compliance Filing submitted in Docket No. E015/RP-21-33.

Commission Order	Requirement	Location
<p><i>In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan</i>, Docket No. E-015/RP-21-33, Order Approving Plan and Setting Additional Requirements (January 9, 2023)</p>		
Order Point 2(d)	All retirement scenarios at Boswell must also include a comprehensive analysis of reliability, customer rate implications, any proposal or Commission decision with respect to NTEC capacity, worker transition, and socioeconomic impacts, including projected impacts on the local tax base for the City of Cohasset and Itasca County.	Section VI, Section V, Appendix F: Transmission Planning Activities, Appendix K: Detailed Analysis Section, Appendix M: Socioeconomic Impact Analysis, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 3	Minnesota Power must file amended affiliated interest agreements and updated capacity dedication amounts as part of the next resource plan or sooner, and parties may analyze whether that amount of NTEC capacity is in the public and ratepayer interest.	See Section II, Section III, Section V, and Section VII.
Order Point 6	<p>In developing its next resource plan, Minnesota Power must consult with stakeholders, including but not limited to parties to the current proceeding, to develop an analysis that will inform its next IRP on the following topics:</p> <ul style="list-style-type: none"> (a) Implications of the Inflation Reduction Act on renewable energy projects. (b) Efforts to access applicable federal Infrastructure Investment and Jobs Act funding. (c) MISO's Long Range Transmission Planning Process. (d) MISO's Seasonal Adequacy Construct changes. (e) An update on regional economic development activities in support of host communities. 	Section II, Section IV, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 7	In developing the modeling analysis to be used in its next resource plan, Minnesota Power must consult with stakeholders, including but not limited to the Department of Commerce, Office of the Attorney General, Large Power Intervenors and the Clean Energy Organizations, regarding the Company's modeling inputs and parameters.	Section II, Section IV, Appendix K: Detailed Analysis Section, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.

Commission Order	Requirement	Location
<i>In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan</i> , Docket No. E-015/RP-21-33, Order Approving Plan and Setting Additional Requirements (January 9, 2023)		
Order Point 8	In its next resource plan, Minnesota Power must include a summary of the modeling stakeholder group discussions, including potential modeling constraints and how Minnesota Power could consider modeling solar-powered generators connected to the Company's distribution grid as a resource.	Section II, Section IV, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 10	In its next resource plan, Minnesota Power must account for local clean energy goals, in aggregate, in forecasting and modeling. In particular, the plan should include consideration of local community generation goals for distributed generation.	Appendix A: Minnesota Power's 2024 Annual Electric Utility Forecast Report, Appendix H: Minnesota Power's Renewable Energy, and Appendix J: Assumptions and Outlooks.
Order Point 11	In its next resource plan, Minnesota Power must work with stakeholders, including but not limited to parties to the current proceeding, to include a stakeholder report, consistent with the following: [Order Points 11(a), 11(b), and 11(c) below]	Section II, Section IV, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 11(a)	Minnesota Power will work to intentionally include stakeholders from groups historically not present in these regulatory processes, like low-income customers and customers from BIPOC (black, indigenous, and communities of color) communities.	Section II and Appendix N: Engagement Report and Societal Cost Benefit Analysis.
Order Point 11(b)	Stakeholders will provide input on a societal cost benefit analysis of Boswell Unit 4 and Hibbard Renewable Energy Center, considering impacts on host communities, workforce, economics, health, system reliability, the environment, and customer costs.	Section II, Appendix N: Engagement Report and Societal Cost Benefit Analysis, and Appendix O: Hibbard Retirement Study.
Order Point 11(c)	An analysis of the near-term steps needed to ensure Minnesota Power meets clean energy goals set in Minnesota state statute.	Section V, Appendix H: Minnesota Power's Renewable Energy, Appendix I: Carbon-Free Standard Compliance, and Appendix N: Engagement Report and Societal Cost Benefit Analysis.

Commission Order	Requirement	Location
<p><i>In the Matter of Further Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. §216B.2422, Subd. 3, Docket No. E-999/CI-14-643</i></p> <p><i>In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06, Docket No. E999/CI-07-1197</i></p> <p><i>In the Matter of Establishing an Updated 2022 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06, Docket No. E999/CI-22-236</i></p> <p>Order Addressing Environmental and Regulatory Costs (December 19, 2023)</p>		
Order Point 1	The Commission hereby quantifies and establishes the range of regulatory costs of carbon dioxide emissions as \$5 to \$75 per short ton effective 2028 and thereafter.	Section IV, Section V, Appendix J: Assumptions and Outlooks, Appendix K: Detailed Analysis Section.
Order Point 2	In all electricity generation resource acquisition proceedings, utilities shall continue to analyze potential resources under a range of assumptions about environmental values and future regulatory costs, including the five modeling scenarios outlined in <i>In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06, Docket No. E-999/CI-07-1199, Order Establishing 2020 and 2021 Estimate of Future Carbon Dioxide Regulation Costs (September 30, 2020), Ordering Paragraph 2, as modified herein.</i>	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis Section.
Order Point 3	In their modeling scenarios, utilities shall consider environmental (that is, externality) costs in every year of the scenario to the extent that those costs exceed the regulatory (that is, internalized) costs for the same year.	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis Section.

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<p><i>In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. §216B.2422, Subd. 3, Docket No. E-999/CI-14-643</i></p> <p><i>In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06, Docket No. E999/CI-07-1197</i></p> <p><i>In the Matter of Establishing an Updated 2022 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06, Docket No. E999/CI-22-236</i></p> <p>Order Addressing Environmental and Regulatory Costs (December 19, 2023)</p>		
Order Point 4	<p>When modeling environmental externality values and future regulatory costs for purposes of analyzing scenarios in a resource plan, utilities shall do the following:</p> <p>A. Model future regulatory costs in Encompass (or a comparable method using other models) in a manner that influences the selection of resource options.</p> <p>B. Model environmental externality values as post-processing add-ons under Encompass (or a comparable method using other models).</p> <p>C. Identify the future regulatory costs of each scenario as part of its Present Value of Revenue Requirement.</p> <p>D. Identify the externality costs of each scenario separately from the Present Value of Revenue Requirement.</p>	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis Section.
Order Point 5	<p>The Commission provisionally adopts and applies the draft measurement of costs related to the emission of greenhouse gases as set forth in the EPA’s External Review Draft of Report on the Social Cost of Greenhouse Gases released in September 2022, and its successors. To this end, the Commission hereby revises its Order Updating Environmental Cost Values (January 3, 2018) in Docket No. E-999/CI-14-643, <i>In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3</i> accordingly.</p>	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis Section.
Order Point 6	<p>Utilities shall demonstrate in their resource plans how they plan to comply with Minnesota’s Carbon-Free Standard and, once finalized, the CO₂ regulation promulgated by the federal Environmental Protection Agency under the federal Clean Air Act, 42 U.S.C. § 7411(b) and (d).</p>	Section I, Section II, Section IV, Section V, Appendix H: Minnesota Power’s Renewable Energy, Appendix I: Carbon-Free Standard Compliance, and Appendix K: Detailed Analysis Section.

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<p><i>In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. §216B.2422, Subd. 3, Docket No. E-999/CI-14-643</i></p> <p><i>In the Matter of Establishing an Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minnesota Statutes § 216H.06, Docket No. E999/CI-07-1197</i></p> <p><i>In the Matter of Establishing an Updated 2022 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06, Docket No. E999/CI-22-236</i></p> <p>Notice of Final EPA Report on the Social Cost of Greenhouse Gases (Jan. 26, 2024)</p>		
Page 2	<p>With its December 19, 2023, Order, the Commission addressed any and all modifications made to the social cost of greenhouse gas values between the draft and final versions of the EPA’s report. In accordance with the Commission’s December 19, 2023, Order, the Commission adopts the social cost of greenhouse gas values contained within the EPA’s final Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances as the successor to the previously released External Review Draft report.</p>	Section IV, Section V, Appendix J: Assumptions and Outlooks, and Appendix K: Detailed Analysis Section.
<p><i>In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon-Free Standard under Minn. Stat. § 216B.1691, Docket No. E-999/CI-23-151</i></p> <p><i>In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota’s CarbonFree Standard, Docket No. E-999/CI-24-352</i></p> <p>Order Initiating New Docket and Clarifying “Environmental Justice Area” (November 7, 2024)</p>		
Page 7	<p>[T]he Commission will provisionally direct utilities, in their filings under the Carbon-Free Standard and in resource plans under Minn. Stat. § 216B.2422, to do the following:</p> <ul style="list-style-type: none"> • Calculate the percentage of carbon-free market purchases on an applicable regional transmission organization subregion—using annual energy fuel mix data—as practicable. • Calculate the percentage of carbon-free energy, when a utility purchases energy from a specified resource such as in the context of a bilateral contract or power purchase agreement, based on the percentage of carbon-free energy generated by the resource. 	<p>Appendix I: Carbon-Free Standard Compliance.</p> <p>The carbon-free energy associated with purchases from specific resources is included in Minnesota Power’s EnCompass modeling.</p>

Commission Order	Requirement	Location
<p><i>In the Matter of a Joint Investigation into the Impacts of the Federal Inflation Reduction Act</i>, Docket No. E,G-999/CI-22-624 Order Setting Requirements related to Inflation Reduction Act (Sept. 12, 2023)</p>		
Order Point 1	<p>The utilities shall maximize the benefits of the Inflation Reduction Act in future resource acquisitions and requests for proposals in the planning phase, petitions for cost recovery through riders and rate cases, resource plans, gas resource plans, integrated distribution plans, and Natural Gas Innovation Act innovation plans. In such filings, utilities shall discuss how they plan to capture and maximize the benefits from the Act, and how the Act has impacted planning assumptions including (but not limited to) the predicted cost of assets and projects and the adoption rates of electric vehicles, distributed energy resources, and other electrification measures. Reporting shall continue until 2032.</p>	<p>Section V, Appendix H: Minnesota Power's Renewable Energy, Appendix J: Assumptions and Outlooks, and Appendix L: Cost Impact by Customer Class.</p>